

JUN 27 2008

**Board of Vocational Nursing
and Psychiatric Technicians**

EDMUND G. BROWN JR., Attorney General
of the State of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General
WILLIAM R. TAYLOR, State Bar No. 222455
Deputy Attorney General
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 897-8764
Facsimile: (213) 897-2804

Attorneys for Complainant

**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2006-1341

MA ROMELINDA SANTIAGO AKA MARIA
ROMELINDA SANTIAGO
1110 Royal Oaks Drive 74
Monrovia, CA 91016

ACCUSATION

Vocational Nurse License No. VN 215388

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians.
2. On or about June 2, 2005, the Board of Vocational Nursing and Psychiatric Technicians ("Board") issued Vocational Nurse License Number VN 215388 to Maria Romelinda Santiago aka Maria Romelinda Santiago ("Respondent"). The Vocational Nurse License was in full force and effect at all times relevant to the charges brought herein and will expire on October 31, 2008, unless renewed.

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1 7. California Code of Regulations, title 16, section 2521, states:

2 “For the purposes of denial, suspension, or revocation of a license pursuant to
3 Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or
4 act shall be considered to be substantially related to the qualifications, functions or duties of a
5 licensed vocational nurse if to a substantial degree it evidences present or potential unfitness of a
6 licensed vocational nurse to perform the functions authorized by his license in a manner
7 consistent with the public health, safety, or welfare.”

8 8. Section 125.3 of the Code provides, in pertinent part, that the Board may
9 request the administrative law judge to direct a licentiate found to have committed a violation or
10 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
11 and enforcement of the case.

12 FIRST CAUSE FOR DISCIPLINE

13 (Conviction of Substantially Related Crime)

14 9. Respondent is subject to disciplinary action under section 2878,
15 subdivision (f) of the Code, as defined in California Code of Regulations, title 16, section 2521,
16 in that Respondent has been convicted of a crime substantially related to the qualifications,
17 functions, or duties of a licensed vocational nurse, as follows:

18 a. On or about April 4, 2008, in the Superior Court of California,
19 County of Los Angeles, East District, in a case entitled *The People of the State of California v.*
20 *Maria Romelinda Santiago* (Case No. 7JB06741), Respondent was convicted by the Court on a
21 plea of guilty for violating one count of Penal Code section 484(A) - Theft of property, a
22 misdemeanor.

23 b. The circumstances surrounding the conviction are that on or about August
24 2, 2007, Respondent was arrested for stealing merchandise from a Wal Mart in Azusa, CA.

25 SECOND CAUSE FOR DISCIPLINE

26 (Dishonest Acts)

27 10. Respondent is subject to disciplinary action under section 2878,
28 subdivision (j) of the Code, for unprofessional conduct, in that Respondent committed dishonest

1 acts, as more fully set forth above in paragraph 9, above.

2 THIRD CAUSE FOR DISCIPLINE

3 (Unprofessional Conduct)

4 11. Respondent is subject to disciplinary action under section 2878,
5 subdivisions (a) and (d) of the Code, in that Respondent committed acts which constitute
6 unprofessional conduct as more fully set forth in paragraph 9, above.

7 PRAYER

8 WHEREFORE, Complainant requests that a hearing be held on the matters herein
9 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric
10 Technicians issue a decision:

- 11 1. Revoking or suspending Vocational Nurse License Number VN 215388,
12 issued to Maria Romelinda Santiago.
- 13 2. Ordering Maria Romelinda Santiago to pay the Board of Vocational
14 Nursing and Psychiatric Technicians the reasonable costs of the investigation and enforcement of
15 this case, pursuant to Business and Professions Code section 125.3;
- 16 3. Taking such other and further action as deemed necessary and proper.

17 DATED: June 27, 2008.

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20 TERESA BELLO-JONES, J.D., M.S.N., R.N.
21 Executive Officer
22 Board of Vocational Nursing and Psychiatric Technicians
23 State of California
24 Complainant